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Hon. Denise L. Cote
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

January 30, 2023

Re: **United States v. Braddy et al., 22-cr-00115-DLC-2**

Denise L. Cote
1/31/23

Dear Honorable J. Denise L. Cote:

As appointed counsel for Ms. Irene Maldonado, I write to respectfully request the removal of the electronic monitoring device from Ms. Maldonado's ankle. Ms. Maldonado has been wearing the device since her release from custody in February 2022 and has been compliant with all terms of her release. I have spoken with United States Probation Officer Francesca Piperato, who states Ms. Maldonado has been completely compliant with the terms of her release, she does not believe that Ms. Maldonado will violate any of her terms of release if the monitor is removed and USPO Piperato has no objection to the requested relief. The government objects to this request.

Ms. Maldonado's surrender date is February 22, 2023. As the Court no doubt knows, Ms. Maldonado has never been in custody previously. For the last thirteen (13) years, Ms. Maldonado has had only two homes. One, a New York City shelter where she lived continuously for approximately eight years with her then infant daughter. The second, for the last five years, is the apartment she resides in with her now 13-year-old daughter. Ms. Maldonado is making a request, fully supported by counsel, that the Court permit her the dignity to walk around with her daughter for her remaining three weeks of liberty without the electronic monitoring device attached to her person 24/7.

Respectfully,

//s//David Jason Cohen//s//

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